



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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MARY F. McTIGUE
DIRECTOR

February 26, 1993
AO-93-03

Representative Kevin G. Honan
Special Legislative Commission
on a John F. Kennedy Memorial
State House - Room 472
Boston, MA 02133

Dear Representative Honan:

This letter is in response to your December 8, 1992, letter requesting an advisory opinion as to whether the remainder of a campaign account can be contributed to the Special Legislative Commission on a John F. Kennedy Memorial ("Commission").

In your letter you stated that a memorial statue of President John F. Kennedy was built on the west lawn of the State House. The Commission has been working throughout the year to raise funds in order to finance the memorial. More than two hundred thousand (\$200,000) dollars has been raised by the Commission, however, a one hundred and fifty thousand (\$150,000) dollar financial obligation remains. The Commission has been working throughout the year to raise funds so that the statue will remain as a gift from the citizens of the Commonwealth. The Commission is a non-profit corporation, I.D. #22-2831189, and all contributions are tax-deductible.

Mr. Joseph Connolly, a former State Representative, would like to donate the remainder of his campaign account to the Commission for the statue's debt and has requested, through you, an advisory opinion as to whether he is legally permitted to close out his account in this manner.

M.G.L. c.55, s.18 was amended by Chapter 175 of the Acts of 1991 in order to permit residual campaign funds to be donated, inter alia, to any entity which is subject to section eight of chapter twelve.

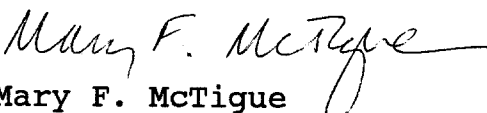
The Office of Campaign and Political Finance ("OCPF") has confirmed with the Attorney General's Division of Public Charities that the Commission is subject to M.G.L. c.12, s.8 and has properly registered with the Division of Public Charities under the name of "The John F. Kennedy Memorial Commission Corporation."

Thus, it is OCPF's opinion that Mr. Connolly may donate his residual campaign funds to the Commission, consistent with the requirements of M.G.L. c.55, s.18, as recently amended.

This opinion has been rendered solely on the basis of the representations made in your letter, copies of letters which were written by Mr. Connolly and solely in the context of M.G.L. c.55.

Please do not hesitate to contact OCPF should you have additional questions about this or any other campaign finance matter.

Very truly yours,


Mary F. McTigue
Director

cc: Joseph Connolly